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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case: 4:24-cr-20078
Judge: Kumar, Shalina D.
MJ: Ivy, Curtis
Filed: 02-21-2024
SEALED MATTER (tt)

FILED
FEB 21 2024
U.S. DISTRICT COURT
FLINT, MICHIGAN

v.

Glenn E. Kotchounian,

Defendant.

Violations:
18 U.S.C. § 922(g)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**Felon in Possession of Ammunition
18 U.S.C. § 922(g)(1)**

1. On or about February 2, 2024, in the Eastern District of Michigan, defendant, Glenn Kotchounian, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, ammunition, that is,

- a. approximately 18 rounds of FC 10mm auto ammunition, and
- b. approximately 197 rounds of Tulammo .308 ammunition, and
- c. approximately 39 rounds of Underwood .357 Sig ammunition, and
- d. approximately 364 rounds of BVA 7.62x39 ammunition, and

- e. approximately 48 rounds of PMC 40 S&W ammunition, and
- f. approximately 83 rounds of Ammo Inc. 5.56mm ammunition; and
- g. approximately 214 rounds of PSD 22 5.56mm ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION
18 U.S.C. § 924(d) and 28 U.S.C. § 2461

2. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461.

3. Upon conviction of the offense charged in Count One of this Indictment, Defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and 28 United States Code, Section 2461, any firearm or ammunition involved in said offense including but not limited to: 18 rounds of FC 10mm auto ammunition; 197 rounds of Tulammo .308 ammunition; 39 rounds of Underwood .357 Sig ammunition; 364 rounds of BVA 7.62x39 ammunition; 48 rounds of PMC 40 S&W ammunition; 35 rounds of 7.62x39mm ammunition with a "10" above the primer on the head stamp; 83 rounds of Ammo Inc. 5.56mm ammunition; and 214 rounds of PSD 22 5.56mm ammunition.

4. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;

- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL
s/GRAND JURY FOREPERSON

GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Anthony Vance
ANTHONY VANCE
Chief, Branch Offices

s/Blaine Longworth
BLAINE LONGSWORTH
Assistant United States Attorney

Dated: February 21, 2024

United States District Court
Eastern District of Michigan

Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: BL <u>R</u>

Case Title: USA v. Glenn E. KotchounianCounty where offense occurred: Genesee

Offense Type: Felony

Indictment -- no prior complaint

Superseding Case Information

Superseding to Case No: _____ Judge: _____

Reason: _____

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

February 21, 2024

Date

s/BLAINE LONGSWORTH

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Bar #: P55984

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.